

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

JOHN DOE AND BOBBI PISOR,

Plaintiffs,

v.

**AMERICA PAC; GROUP AMERICA,
LLC; AND ELON MUSK**

Defendants.

:
:
:
:
:
:
:
:
:
:
:
:

No. 2:25-cv-01691-WB

ORDER

AND NOW, this _____ day of _____ 2025, upon consideration of Defendants' Motion to Dismiss, the Motion is **GRANTED** and Plaintiffs' Amended Complaint is **DISMISSED** with prejudice.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

JOHN DOE AND BOBBI PISOR,

Plaintiffs,

v.

**AMERICA PAC; GROUP AMERICA,
LLC; AND ELON MUSK**

Defendants.

:
:
:
:
:
:
:
:
:
:
:
:

No. 2:25-cv-01691-WB

DEFENDANTS' MOTION TO DISMISS

Pursuant to Federal Rule of Civil Procedure 12, Defendants America PAC, Group America LLC, and Elon Musk (collectively the “Defendants”), by counsel, hereby move to dismiss Plaintiffs’ Amended Complaint with prejudice for the reasons contained in their Brief in Support of Motion to Dismiss.

Date: June 9, 2025

/s/ Matthew H. Haverstick
Matthew H. Haverstick (No. 85072)
KLEINBARD LLC
Three Logan Square, 5th Floor
1717 Arch Street
Philadelphia, PA 19103
Phone: (215) 568-2000
Fax: (215) 568-0140
Eml: mhaverstick@kleinbard.com

/s/ Anne Marie Mackin
Chris K. Gober*
Texas State Bar No. 24048499
Andy Taylor*
Texas State Bar No. 19727600
Anne Marie Mackin*
Texas State Bar No. 24078898
Jesse Vazquez*
Florida State Bar No. 1013573
Lex Politica PLLC
P.O. Box 341015
Austin, TX 78734
Telephone: (512) 354-1785
cgober@lexpolitica.com
ataylor@ataylorlaw.com
amackin@lexpolitica.com
jvazquez@lexpolitica.com

Attorneys for Defendants

**Admitted pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on June 9, 2024, I electronically filed the foregoing documents and that they are available for viewing and downloading from the Court's CM/ECF system, and that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Date: June 9, 2025

/s/ Matthew H. Haverstick
Matthew H. Haverstick (No. 85072)
KLEINBARD LLC
Three Logan Square, 5th Floor
1717 Arch Street
Philadelphia, PA 19103
Phone: (215) 568-2000
Fax: (215) 568-0140
Eml: mhaverstick@kleinbard.com